

**IN THE UNITED STATES COURT OF THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

HEATHER WATTS,

Plaintiff,

v.

HOSPITALITY VENTURES, LLC,

Defendant.

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Case No. 2006-cv01149-MEF

MOTION TO EXTEND TIME

**PLAINTIFF'S REQUEST FOR ADDITIONAL TIME TO AMEND RESPONSE
TO DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

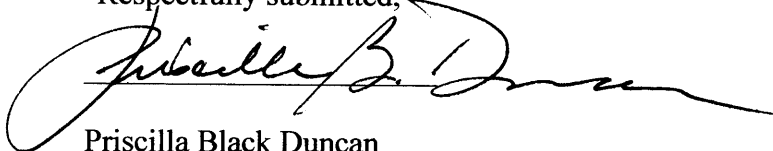
COMES NOW, Plaintiff Heather Watts, by and through her named counsel, and petitions the Court to extend the August 10 deadline, (Doc. 20) for responding to Defendant's Motion for Partial Summary Judgment for following reasons:

1. Parties engaged in two full days of deposition testimony on July 19 and 20. The record of that testimony has not been received from the court reporters at this time, despite encouragement to accelerate production.
2. Deposition testimony contains statements and exhibits which are critical to the plaintiff's case and which would prejudice the plaintiff, if unavailable.
2. Defendant is not believed to be opposed to an extension, as it has an additional seven days to respond to Plaintiff's brief. Defendant also is awaiting deposition transcripts.

WHEREFORE, Plaintiff requests the Court to extend its deadline for Plaintiff's response by an additional 14 days.

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U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Respectfully submitted,



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Certificate of Service

I hereby certify that a true copy of the above and foregoing has been served upon the following attorneys of record by U.S. Mail, postage prepaid and by submission through the CM/EMS electronic filing system of the U.S. Court.



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